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*Attorneys for Defendants Michael Kaplan  
and Adam Kaplan*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LUXX INTERNATIONAL, LLC, a Florida  
limited liability company; and WAYDE KING,  
an individual;

Plaintiff,

vs.

PURE WATER TECHNOLOGIES, a Nevada  
limited liability company; TASTY ONE, LLC, a  
foreign limited liability company; MICHAEL  
KAPLAN, an individual; and ADAM  
KAPLAN, an individual,

Defendants.

Case No. 2:23-cv-00512MMD-DJA

**STIPULATION AND ORDER TO EXTEND  
TIME FOR DEFENDANT'S TO FILE A  
RESPONSE TO PLAINTIFF'S  
COMPLAINT [ECF NO. 1]**

**[FIRST REQUEST]**

Defendants PURE WATER TECHNOLOGIES, by and through its attorney of record, the law  
offices of MARC D. RISMAN, TASTY ONE, by and through its attorneys of record, MCMENEMY  
HOLMES PLLC, MICHAEL KAPLAN and ADAM KAPLAN, by and through their attorneys, the  
law firm of MAIER GUTIERREZ & ASSOCIATES and plaintiffs LUXX INTERNATIONAL, LLC and  
WAYDE KING ("Plaintiffs"), by and through their attorneys of record, LEWIS ROCA ROTHGERBER  
CHRISTIE LLP, hereby STIPULATE AND AGREE that Defendants' deadline to file a response to  
Plaintiffs' Complaint [ECF No. 1] should be extended to and including **Wednesday, May 17, 2021.**

The current deadline to respond to the complaint is May 3, 2023. This stipulation represents an extension of that deadline of not more than 14 days and is requested to allow newly retained defendants' counsel to gather information and to accommodate a family medical emergency that has affected the availability of Mike and Adam Kaplan to provide information necessary for the response. This extension is sought in good faith and not for purposes of delay. This is the first extension of this deadline.

DATED this \_\_\_ day of April 2023.

**MAIER GUTIERREZ & ASSOCIATES**

*/s/ Jean-Paul Hendricks*

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*Attorneys for Defendants Michael Kaplan  
and Adam Kaplan*

DATED this \_\_\_ day of April 2023.

**LEWIS ROCA ROTHGERBER CHRISTIE LLP**

*/s/ Eric N. Kohli*

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ERIC N. KOHLI, ESQ.  
Nevada Bar No. 15763  
3993 Howard Hughes Parkway, Suite 600  
Las Vegas, Nevada 89169  
*Attorneys for Plaintiffs Luxx International,  
LLC and Wayde King*

DATED this \_\_\_ day of April 2023.

**MARC D. RISMAN, & EMERY LLP**

*/s/ Marc D. Risman*

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MARC D. RISMAN, ESQ.  
Nevada Bar No. 2455  
3722 Las Vegas Boulevard, Suite 606  
Las Vegas, Nevada 89158  
*Attorney for Defendant Pure Water  
Technologies*

DATED this \_\_\_ day of April 2023.

**McMENEMY HOLMES PLLC**

*/s/ Dustin H. Holmes*

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DUSTIN H. HOLMES, ESQ.  
Nevada Bar No. 12776  
1645 Village Center Circle, Suite 291  
Las Vegas, Nevada 89134  
*Attorney for Defendant Tasty One, LLC*

IT IS SO ORDERED.

DATED April 28 2023.

  
\_\_\_\_\_  
DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE